

EXHIBIT A



Service of Process Transmittal Summary

TO: KIM LUNDY- EMAIL
Walmart Inc.
GLOBAL GOVERNANCE/CENTRAL INTAKE, 2914 SE I STREET MS#0200
BENTONVILLE, AR 72712-3148

RE: Process Served in Virginia

FOR: Wal-Mart Stores East, LP (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	Re: FARLEY WILLIAM // To: Wal-Mart Stores East, LP
DOCUMENT(S) SERVED:	Summons, Complaint
COURT/AGENCY:	Louisa County Circuit Court, VA Case # 109CL24000232
NATURE OF ACTION:	Employee Litigation - Discrimination
PROCESS SERVED ON:	C T Corporation System, Glen Allen, VA
DATE/METHOD OF SERVICE:	By Process Server on 02/25/2025 at 12:04
JURISDICTION SERVED:	Virginia
APPEARANCE OR ANSWER DUE:	Within 21 days after service
ATTORNEY(S)/SENDER(S):	Joshua Erlich THE ERLICH LAW OFFICE, PLLC 2111 Wilson Blvd., Ste. 700 Arlington, VA 22201 703-791-9087
ACTION ITEMS:	CT has retained the current log, Retain Date: 02/26/2025, Expected Purge Date: 03/08/2025 Image SOP Email Notification, Grymarys De Jesus grymarys.dejesus@walmart.com
REGISTERED AGENT CONTACT:	C T Corporation System 4701 Cox Road, Suite 285 Glen Allen, VA 23060 8775647529 MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT



Wolters Kluwer

CT Corporation
Service of Process Notification

02/25/2025

CT Log Number 548497508

disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.



PROCESS SERVER DELIVERY DETAILS

Date: Tue, Feb 25, 2025
Server Name: Drop Service -Deputy Cone

Entity Served	WAL-MART STORES EAST, LP
Case Number	109CL24000232
Jurisdiction	VA

Inserts		



COMMONWEALTH OF VIRGINIA



LOUISA CIRCUIT COURT
Civil Division
BOX 37, 100 W. MAIN ST.
LOUISA VA
(540) 967-5312

Summons

To: WAL-MART STORES EAST, LP
C T CORPORATION SYSTEM
4701 COX ROAD, SUITE 285
GLEN ALLEN VA 23060

Case No. 109CL24000232-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Thursday, February 20, 2025

Clerk of Court: PATTY C MADISON

by Jenshaw Rupe
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: ERLICH, JOSHUA
1550 WILSON BLVD SUITE 700
ARLINGTON VA 22209

VIRGINIA:

IN THE CIRCUIT COURT OF LOUISA COUNTY, VIRGINIA

FILED IN THE CLERK'S OFFICE
OF THE CIRCUIT COURT OF THE
LOUISA COUNTY CIRCUIT
DATE: 07/22/2024 @14:05:04

WILLIAM FARLEY

PATTY MADISON, CLERK

Plaintiff,

TESTE: Kwame

v.

No. CL24000232-00

WAL-MART STORES EAST, LP

JURY TRIAL DEMAND

SERVE:

C T CORPORATION SYSTEM

4701 Cox Road, Suite 285

Glen Allen, VA, 23060

Defendant.

COMPLAINT

Plaintiff William Farley ("Mr. Farley" or "Plaintiff"), by counsel, for his Complaint against Wal-Mart Stores East, LP ("Walmart" or "Defendant") alleges as follows:

NATURE OF ACTION

1. This is an action to recover compensatory damages, punitive damages, attorneys' fees, and costs arising from Defendant's discrimination against Mr. Farley based on his disability in violation of the Virginia Human Rights Act ("VHRA"), Va. Code § 2.2-3900, *et seq.*

PARTIES

2. At all times relevant to this Complaint, Mr. Farley was an adult resident of the Commonwealth of Virginia.

3. Defendant Wal-Mart Stores East LP is the entity that operates the Walmart distribution center in Gordonsville, Virginia that employed Mr. Farley.

4. Walmart, Inc. is a multinational operator of retail supermarkets headquartered in the State of Arkansas.

5. At all times relevant to this complaint, Wal-Mart Stores East LP engaged in business in Virginia.

VENUE AND JURISDICTION

6. Defendant is subject to personal jurisdiction of this Court because it regularly conducted business within this judicial district during all relevant times.

7. Defendant employed Mr. Farley within the company's distribution center in Louisa County, Virginia, at all times relevant to this Complaint.

8. Venue is proper in this Court under Va. Code § 8.01-262 because the incidents which give rise to this Complaint occurred within this judicial district.

EXHAUSTION OF ADMINISTRATIVE REQUIREMENTS

9. Mr. Farley filed a charge of disability discrimination with the Virginia Attorney General's Office of Civil Rights on March 8, 2023. The claim was dual filed with the Equal Employment Opportunity Commission ("EEOC") based upon a workshare agreement between the two agencies.

10. The EEOC issued Mr. Farley a Notice of Right to Sue based on his charge on October 2, 2023.

11. The Virginia Attorney General's Office of Civil Rights issued Mr. Farley a Notice of Right to Sue based on his charge on April 23, 2024.

12. Mr. Farley files the instant Complaint within 90 days of receipt of the notices of right to sue and his Complaint is timely filed.

FACTUAL BACKGROUND

13. Mr. Farley is a disabled Veteran who served in Operation Enduring Freedom from May 2016 to April 2017.

14. He was discharged honorably from military service in 2021.

15. On or about March 9, 2020, Walmart hired Mr. Farley as a Dry Order Filler in its distribution warehouse in Gordonsville, Virginia.

16. In April 2020, Mr. Farley was promoted to a Continuous Skills Development ("CSD") Lead at the distribution center.

17. In March 2021, Mr. Farley was diagnosed with Post-Traumatic Stress Disorder ("PTSD") stemming from his military service.

18. Mr. Farley suffers from occasional panic attacks caused by his PTSD. His panic attack symptoms include extreme feelings of stress and anxiety, accelerated heart rate, and difficulty with breathing.

19. The PTSD from which Mr. Farley suffers substantially affects his ability to sleep, process information, think clearly, and regulate his emotions. It affects his neurological, cardiac, and respiratory systems.

20. In July 2021, Mr. Farley began using medical cannabis to treat his disability. Mr. Farley found that medical cannabis use reduced the frequency and severity of his PTSD symptoms.

21. The Commonwealth of Virginia permits the use of medical cannabis to treat qualified disabilities, including PTSD.

22. Mr. Farley never used cannabis while at work or on days when he was scheduled to work for Walmart.

23. In May 2022, Mr. Farley applied for a promotion to the position of Real Estate Warehouse Manager within the Gordonsville distribution center.

24. Mr. Farley was offered the Real Estate Warehouse Manager position in July 2022.

25. Walmart required Mr. Farley to take a drug screen prior to effectuating his promotion.

26. Before completing the drug screen, Mr. Farley disclosed to his hiring supervisor that he was a disabled veteran who used medical cannabis to treat his disability.

27. Mr. Farley expressed concern that his drug screen would show a positive result for cannabis.

28. Mr. Farley's supervisor, Christopher Adams, informed Mr. Farley that he should still take the test. Adams told Mr. Farley he could continue to work for Walmart as a CSD lead if the drug screen prevented his promotion.

29. Mr. Farley completed the drug screen on July 28, 2022, which positively identified his cannabis use.

30. On August 1, 2022, Walmart suspended Mr. Farley due to his positive drug screen.

31. Walmart terminated Mr. Farley on August 12, 2022.

COUNT I
Disability Discrimination in Violation of the VHRA

32. The allegations in the foregoing paragraphs are incorporated as if realleged herein.

33. The Virginia Human Rights Act is designed to "safeguard all individuals within the Commonwealth from unlawful discrimination in employment because of...disability."

34. Mr. Farley's use of medical cannabis was both an effective and legal means of treating his disability.

35. Walmart terminated Mr. Farley due solely to the treatment he used for is disability on days when he was off the job.

36. Defendant's decision to terminate Mr. Farley for his cannabis use constitutes disability discrimination in violation of the VHRA.

AD DAMNUM

WHEREFORE, Plaintiff William Farley requests that this Court enter judgment in his favor against Defendant Wal-Mart Stores East LP, and:

1. As to Count I, award Plaintiff an amount of \$350,000.00 in compensatory damages, punitive damages, attorneys' fees, and costs due to Defendant's violation of the VHRA; and,
2. Award Plaintiff such other and further relief as may be appropriate.

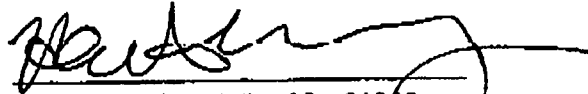
JURY DEMAND

PLAINTIFF WILLIAM FARLEY DEMANDS A TRIAL BY JURY ON ALL ISSUES SO TRIABLE.

Dated:

July 19, 2024

Respectfully,
WILLIAM FARLEY



Joshua Erlich, VA Bar No. 81298

Katherine L. Herrmann, VA Bar No. 83203

Heather E. Murray, VA Bar No. 98648

THE ERLICH LAW OFFICE, PLLC

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